

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

CHRISTIAN F. HOLINKA

NYCAL

Plaintiff,

Index No.: 114120-06

-against-

**A.O. SMITH WATER PRODUCTS, et al. including  
RHEEM MANUFACTURING COMPANY,**

**ANSWER TO VERIFIED  
COMPLAINT**

Defendants.

Defendant, **RHEEM MANUFACTURING COMPANY i/p/a RHEEM  
MANUFACTURING CORP.,** through its attorneys **LAW OFFICES OF IAN R.  
GRODMAN, P.C.,** in answer to plaintiff's Verified Complaint sets forth as follows:

**THE PARTIES**

1. This answering defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph 1 of the Complaint.

2. This answering defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraphs 2 through 19 of the Complaint.

3. This answering defendant denies the allegations contained in paragraphs 20 and 21 of the Complaint .

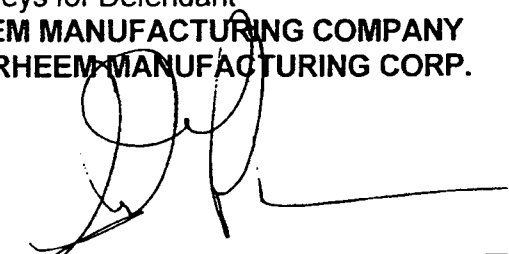
4. This answering defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraphs 22, 23, 24 and 25 of the Complaint.

**FILED**  
**MAR 08 2009**  
**NEW YORK**  
**COUNTY CLERK'S OFFICE**

Dated: New York, New York  
January 31, 2007

Yours, etc.  
LAW OFFICES OF IAN R. GRODMAN, P.C.  
Attorneys for Defendant  
**RHEEM MANUFACTURING COMPANY**  
i/p/a ~~RHEEM MANUFACTURING CORP.~~

By: \_\_\_\_\_

  
**IAN R. GRODMAN**  
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New York, NY 10038  
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**Our File No.: 0345-RNY**